

1 BRIAN WEISS
Court Appointed Receiver
2 Force Ten Partners, LLC
20341 S.W. Birch Street, Suite 220
3 Newport Beach, CA 92660
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4 Email: bweiss@force10partners.com
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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 In re

12 EAGAN AVENATTI, LLP

13 Debtor
14
15

Case No. 8:18-CV-01644-VAP-KES

RECEIVER'S FIRST INTERIM REPORT

Date: No Hearing Required
Time:
Place:

Pursuant to the Joint Stipulation between Judgment Debtor Eagan Avenatti, LLP (“EA”) and Michael Avenatti (“Avenatti”) and Judgment Creditor Jason Frank Law (“JFL”), on February 13, 2019, I (Brian Weiss) was appointed as the Receiver of EA (the “Appointment Order”) [Docket No. 53].

Pursuant to the Appointment Order, I executed and filed with this Court, my oath.

The purpose of this report is to provide:

- A narrative of material events;
- A financial report;
- An accounting of the income and expenses incurred in the administration of EA, including the Receiver’s fees and expenses;

Efforts by the Receiver to Identify, Quantify and Recover Assets and Material Events

I caused the Appointment Order to be served upon financial institutions with which EA was known by me to have had accounts, including:

- Bank of America
- City National Bank
- California Bank & Trust

I requested that all accounts controlled by EA be transferred to my control. There were no active bank accounts and none of the accounts had any cash or activity for several months preceding my appointment.

I have conferred with JFL and Avenatti to develop a list of active litigation cases, and how to maximize the return to EA on these cases. These discussions are on-going. Attached as Exhibit A is a list of the active client cases that have been reported to me (“Active Cases”).

I have requested documents from the following third parties:

- X-Law Group, a firm who purportedly purchased assets (via cancellation of debt) from EA. These assets consist of art work, computers, and computer servers. X-Law Group has reported to me that it did not receive those assets (except possibly art work) and none of the assets have been turned over to me. Communications with X-Law Group’s legal counsel are on-going;

- 1 • Garrett/Mosier Insurance Services, EA's former insurance broker. As of August
2 2018, EA did not have a business insurance policy in place;
- 3 • Storage facility in possession of EA's office equipment. An inventory report has
4 been provided by this entity. A copy of the Appointment Order has been provided
5 to this entity;
- 6 • Art storage facility in possess of art work that EA may have an interest in. An
7 inventory report has been provided. A copy of the Appointment Order has been
8 provided to this entity;
- 9 • Avenatti has provided only limited information in response to requests I have
10 made since the Appointment Order. Exhibit B lists the items requested, open and
11 received. Based on my requests and what has been received as of the date of this
12 report, the level of cooperation, in my opinion has not followed the letter or the
13 spirit of the Appointment Order and has not been sufficient to enable me to fully
14 perform my tasks as the receiver. My legal counsel will be filing a motion in an
15 attempt to compel the production of the outstanding documents.
- 16 • Based on my initial assessment, as of the date of this report, and subject to further
17 investigation, the key assets potentially available for recovery include:
 - 18 ○ Recoveries from active client cases, of which the majority are contingency-
19 based;
 - 20 ○ Artwork and office furniture, which may be subject to an enforceable Asset
21 Purchase Agreement by which X-Law Group purportedly purchased those
22 assets from EA. Certain of those assets also may be subject to a marital
23 dissolution agreement between Avenatti and his former spouse;
 - 24 ○ Avoidance actions which are being investigated.
- 25 • My legal counsel is in the process of notifying all clients on the Active Cases List
26 of the Appointment Order.
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1 **Financial Report**

2 As of March 31, 2019, I am holding pursuant to the Court's Order, \$0 in cash as EA did
3 not have cash as of the date the Appointment Order, nor have I collected any funds for EA or its
4 clients since the Appointment Order.

5 **Intervening Events**

6 On March 7, 2019, Avenatti filed a petition for relief under chapter 11 of the bankruptcy
7 code on behalf of EA. I had spoken to Avenatti prior to that filing, and advised him that (i) I was
8 the only person authorized to file bankruptcy on behalf of EA pursuant to the Receivership Order
9 §14(s) and (ii) he was not authorized by me to file bankruptcy on behalf of EA. Moreover,
10 Avenatti changed the name of EA to "Trial Group, LLP" for the purposes of the bankruptcy
11 filing; the case number is 8:19-bk-10822-CB, and was assigned to Bankruptcy Judge Catherine
12 Bauer.

13 I believe Avenatti placed EA into bankruptcy to delay and/or avoid his judgment debtor
14 examination set to be taken by Jason Frank Law, PLC ("Jason Frank"), the next day on March 8,
15 2019, as well as to waylay my efforts to continue to act as the receiver (a chapter 11 bankruptcy
16 generally automatically divests a previously appointed receiver of jurisdiction and imposes an
17 automatic stay which prohibits non-bankruptcy efforts to take control of or administer a debtor's
18 assets). In response to the bankruptcy, Jason Frank filed an emergency motion to dismiss the
19 bankruptcy on March 8, 2019, with a hearing on shortened time set for March 13, 2019. I filed a
20 joinder to Jason Frank's motion, also requesting that the bankruptcy be dismissed. On March 19,
21 2019, the Bankruptcy Court entered an order dismissing EA's bankruptcy case as null and void
22 and retroactive to March 7, 2019, the date the petition was filed.

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Summary of EA's Monthly Income and Expenses

From the date of the Receivership Appointment through February 28, 2019, has incurred no operating costs. The professional fees during this time period include the following:

| Professional | Fees & Costs Incurred | Fees Paid | Total Fees Due |
|------------------------------------|----------------------------------|------------------|-----------------------|
| Receiver & Force Ten Partners, LLC | \$19,274.10 See Exhibit C | \$0 | \$19,274.10 |
| Landau Gottfried & Berger LLP | \$7,723.50 See Exhibit D | \$0 | \$7,723.50 |

As described in this report, I am continuing to carry out my court-ordered duties and my efforts are ongoing. I will report all material developments in future reports.

This report contains information that is subject to my continuous review, and every effort will be made to advise the recipients of any significant changes or corrections.

I hereby declare that this report is accurate to the best of my knowledge.

Executed at Newport Beach, California on March 31, 2019.

BRIAN WEISS, RECEIVER

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EXHIBIT A

| Case Name | Court | Case Number |
|---|---|--|
| Alpha GRP, Inc. v. Subaru of America, Inc. | USDC – Central California | 2:18-cv-02133 MWF |
| Alvarez v. Campbell/City of Los Angeles | LASC – Santa Monica | BC537145 |
| Bahamas Surgery Center, v. Kimberly Clark Corporation | USDC – Central California | 14-CV08390 DMG/Appellate No. 18-155558 |
| Clifford v. Davidson * | LASC – Santa Monica | SC129384 |
| Clifford v. Trump * | USDC – Central California | 2:18-cv-02217 SJO |
| Croxton v. Myla | OCSC | 30-2017-00907481 |
| Engel v. Marina Del Rey Hospital | LASC | BC638697 |
| Feldblumb v. Minsky | OCSC | 30-2018-00984383-CU-MT-CXC |
| Herrick v. National Football League | USDC – Northern Ohio | 5:17-cv-472 |
| Le v. Saldivar | LASC - LA | BC691517 |
| Martinez v. Pawlik | LASC | BC681379 |
| Medline v. Kimberly Clark | USDC – Northern Georgia | 1:17-cv-02032 |
| Naeyaert v. Kimberly Clark | USDC Central California | 5:17-cv-00950 |
| Newman v. Malvin | OCSC | 30-2017-00949469-CU-PA-CJC |
| Oberman v. Lanman | LASC - LA | BC629857 |
| Shahinian v. Kimberly Clark (Qui Tam) [USA v. Kimberly-Clark Corporation] | USDC – Central California | 2:14-cv-08313 JAK |
| Shaver v. Cohen, M.D. | OCSC | 30-2017-00920858-CU-MM-CJC |
| Silva v. Minsky (Children’s Dental Group Cases) | LASC | BS167372 |
| Smart Tech v. Cal Trans | Office of Administrative Hearings | A-0028-2016 |
| The Estate of Kathryn Mary Mar v. Beverly Hills Medica | LASC | BC698508 |
| Treviso v. NFL | USDC - Northern Ohio | 5:17-CV-00472 CAB |
| Young Blue, LLC v. Herron | LASC | BC693618 |
| Heritage v. DFG Group, LLC | Florida Fourth District Court of Appeal | 4D16-2972 |

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EXHIBIT B

| Item | Request Date | Due Date | Status |
|---|--------------|-----------------------|--------|
| 1. List of all bank accounts, including client trust and IOLTA accounts. Include the name of the depository, account number and purpose/client matter for each account. | 2/15/2019 | 2/15/2019 | Closed |
| 2. Most recent payroll report and contact information for third party payroll processor. | 2/15/2019 | 2/15/2019 | Open |
| 3. Independent contractor agreements for all current contractors providing legal services to EA. | 2/15/2019 | 2/18/2019 | Closed |
| 4. QuickBooks accounting software. | 2/15/2019 | 2/15/2019 | |
| a. Location of server where the software resides | | | Closed |
| b. Immediate access to the server | | | Open |
| c. If the software resides on a non-networked computer, email a back- up copy to me. | | | Open |
| d. Administrative user name and password. | | | Open |
| 5. Time and billing software. | 2/15/2019 | 2/15/2019 | |
| a. Location of server where the software resides | | | Closed |
| b. Immediate access to the server | | | Open |
| c. If the software resides on a non-networked computer, email a back- up copy to me. | | | Open |
| d. Administrative user name and password. | | | Open |
| 6. All insurance policies including declaration pages | 2/15/2019 | 2/15/2019 | |
| a. Provide contact name of the insurance broker. | | | Closed |
| 7. List of each outstanding case including: | 2/15/2019 | 2/18/2019 | |
| a. Client contact information | | | Open |
| b. Billing arrangement (hourly, monthly, contingency) | | | Closed |
| c. Status | | | Closed |
| 8. Kimberly Clark case (Bahamas) | 2/15/2019 | 2/18/2019 | |
| a. Contract/arrangement with the Esner firm | | | Closed |
| b. Status of litigation | | | Closed |
| 9. Accounts receivable aging report with the status of collection for each invoice. | 2/15/2019 | 2/18/2019 | Open |
| 10. List of outstanding unpaid invoices. | 2/15/2019 | 2/18/2019 | Closed |
| 11. Offsite records storage company | 2/15/2019 | 2/15/2019 | |
| a. Address | | | Closed |
| b. Contact information | | | Closed |
| c. Contract | | | Closed |
| 12. Office furniture held in storage | 2/15/2019 | 2/15/2019 | |
| a. Address | | | Open |
| b. Contact information | | | Open |
| c. Contract | | | Open |
| 13. Asset sale agreement or or around August 2018 between Fillipo Marchino and Eagan Avenatti | 2/20/2019 | No later than 2/25/19 | Closed |
| 14. Bahamas v. Kimberly Clark class certification notice appointing M. Avenatti as class counsel | 2/20/2019 | No later than 2/25/19 | Closed |
| 15. Fee arrangement between Eagan Avenatti and M. Avenatti for the Bahamas v. Kimberly Clark case | 2/20/2019 | No later than 2/25/19 | Open |
| 16. List and status of open cases | 2/20/2019 | No later than 2/25/19 | Closed |
| 17. List and status of pending litigation against Eagan Avenatti | 2/20/2019 | No later than 2/25/19 | Closed |
| 18. Joint defense strategy for litigation against Eagan Avenatti and M. Avenatti entities. | 2/20/2019 | No later than 2/25/19 | Open |
| 19. O'Malley Settlement Agreement with Eagan Avenatti | 2/27/2019 | | Closed |
| 20. Copy of note promissory note agreement between Eagan Avenatti and Michael Avenatti. | 3/5/2019 | | Open |
| 21. Fee sharing arrangements | 3/5/2019 | | Open |
| 22. Partnership documents relating to the departure of M. Eagan | 3/5/2019 | | Open |
| 23. Avenatti & Associates current insurance policy | 3/5/2019 | | Open |
| 24. Documents to support the changing of the name of Eagan Avenatti to The Trial Group, LLP. | 3/11/2019 | 3/11/2019 | Open |
| 25. Bank account number where the Medline payments are being deposited into. | 3/13/2019 | | Open |

| Item | Request Date | Due Date | Status |
|--|--------------|----------|--------|
| 26. Agreements with X-Law Group and EA that gave rise to the \$2 million liability they are claiming against EA. | 3/13/2019 | | Open |
| 27. Copy of car registration for the Cadillac Escalade. | 3/13/2019 | | Open |

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EXHIBIT C

INVOICE

From

Force 10 Partners

20341 SW Birch, Suite 220
 Newport Beach, CA 92660
 (949) 357-2360
 www.force10partners.com

Invoice For

**Eagan Avenatti, LLP
 Receivership**

Invoice ID

912

Invoice Date

02/28/2019

Due Date

02/28/2019 (upon receipt)

Subject

Professional services rendered.

| Item Type | Description | Time (in hours) | Rate | Amount |
|-----------|---|-----------------|----------|-------------------|
| Service | 02/12/2019 - Business Operations / Brian Weiss: Prepare Weiss declaration and background materials for the receivership motion. | 1.50 | \$495.00 | \$742.50 |
| Service | 02/14/2019 - Business Operations / Brian Weiss: Read receivership motion and order. | 0.70 | \$495.00 | \$346.50 |
| Service | 02/14/2019 - Business Operations / Brian Weiss: Prepare project planning. | 2.70 | \$495.00 | \$1,336.50 |
| Service | 02/14/2019 - Business Operations / Brian Weiss: Meeting with J. Frank to review documentation prepared including banking transaction, Valid8 software, potential open cases, etc. | 3.90 | \$495.00 | \$1,930.50 |
| Service | 02/14/2019 - Business Operations / Brian Weiss: Read notification letters from J. Reitman to clients and financial institutions. | 0.30 | \$495.00 | \$148.50 |
| Service | 02/14/2019 - Business Operations / Brian Weiss: Telco with CB&T re: bank accounts and provide copy of Receivership order. | 0.20 | \$495.00 | \$99.00 |
| Service | 02/14/2019 - Business Operations / Brian Weiss: Telco with OC Fine Arts. Provide copy of Receivership order and instructions re: custody of art held. | 0.30 | \$495.00 | \$148.50 |
| Service | 02/15/2019 - Business Operations / Brian Weiss: Telco with J. Reitman re: case issues. | 0.30 | \$495.00 | \$148.50 |

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|---------|--|------|----------|-------------------|
| Service | 02/15/2019 - Business Operations / Brian Weiss: Telco with J. Frank re: bank records. | 0.30 | \$495.00 | \$148.50 |
| Service | 02/15/2019 - Preference / Avoidance Actions / Brian Weiss: Read Honda jet documents for potential fraudulent transfer. | 0.50 | \$495.00 | \$247.50 |
| Service | 02/15/2019 - Business Operations / Brian Weiss: Prepare letter to M. Avenatti re: request for information and general business inquiries. | 0.90 | \$495.00 | \$445.50 |
| Service | 02/15/2019 - Business Operations / Brian Weiss: Change mailing address for EA for LA and Newport addresses. | 0.20 | \$495.00 | \$99.00 |
| Service | 02/15/2019 - Business Operations / Brian Weiss: Telco with City National Bank re: account balances, open accounts, closed accounts, etc. | 0.40 | \$495.00 | \$198.00 |
| Service | 02/15/2019 - Business Operations / Brian Weiss: Telco with CB&T re: account balances. Analyze bank statements provided, | 0.50 | \$495.00 | \$247.50 |
| Service | 02/15/2019 - Business Operations / Brian Weiss: Telco with OC Fine Arts re: inventory listing, possession instructions and unpaid invoices. Read inventory listing and prepare cursory research. | 0.50 | \$495.00 | \$247.50 |
| Service | 02/18/2019 - Case Administration / Brian Weiss: Prepare engagement work plan and asset investigation. | 4.00 | \$495.00 | \$1,980.00 |
| Service | 02/18/2019 - Business Operations / Brian Weiss: Read correspondence from M. Avenatti and prepare response. | 0.20 | \$495.00 | \$99.00 |
| Service | 02/18/2019 - Business Operations / Brian Weiss: Telco with J. Frank re: upcoming judgment debtor's exam. | 0.30 | \$495.00 | \$148.50 |
| Service | 02/18/2019 - Business Operations / Brian Weiss: Prepare correspondence to M. Avenatti re: Kimberly Clark case. | 0.20 | \$495.00 | \$99.00 |
| Service | 02/20/2019 - Business Operations / Brian Weiss: Telco with M. Avenatti re: business operations and open information requests. | 1.00 | \$495.00 | \$495.00 |
| Service | 02/20/2019 - Business Operations / Brian Weiss: Prepare information for opening of Receiver bank accounts. | 0.20 | \$495.00 | \$99.00 |
| Service | 02/20/2019 - Business Operations / Brian Weiss: Prepare information request letter to M. Avenatti based on telco. | 1.60 | \$495.00 | \$792.00 |
| Service | 02/20/2019 - Business Operations / Brian Weiss: Telco with J. Frank re: potential open EA cases. | 0.20 | \$495.00 | \$99.00 |
| Service | 02/21/2019 - Business Operations / Brian Weiss: Read arbitration demand and brief in the Barella (Brock) matter. | 0.80 | \$495.00 | \$396.00 |

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|---------|---|------|----------|-------------------|
| Service | 02/21/2019 - Business Operations / Brian Weiss: Telco with J. Reitman re: receivership matters. | 0.30 | \$495.00 | \$148.50 |
| Service | 02/22/2019 - Business Operations / Brian Weiss: Prepare correspondence to M. Avenatti re: non-compliance with information requests. | 0.30 | \$495.00 | \$148.50 |
| Service | 02/22/2019 - Business Operations / Brian Weiss: Read judgment debtor's exam. | 1.40 | \$495.00 | \$693.00 |
| Service | 02/22/2019 - Business Operations / Brian Weiss: Open receivership bank accounts and sign forms. | 0.30 | \$495.00 | \$148.50 |
| Service | 02/25/2019 - Information Technology Consulting / Erik Nathan: Internal discussion. Case intro. | 0.20 | \$375.00 | \$75.00 |
| Service | 02/25/2019 - Business Operations / Brian Weiss: Telco with J. Frank and J. Reitman re: case background and issues. Prepare for meeting. | 1.50 | \$495.00 | \$742.50 |
| Service | 02/25/2019 - Business Operations / Brian Weiss: Read correspondence from M. Avenatti in response to inquiries and information requests. Update control log. | 0.30 | \$495.00 | \$148.50 |
| Service | 02/25/2019 - Business Operations / Brian Weiss: Telco with J. Frank re: open cases and depositions. | 0.30 | \$495.00 | \$148.50 |
| Service | 02/25/2019 - Business Operations / Brian Weiss: Process mail. | 0.30 | \$495.00 | \$148.50 |
| Service | 02/25/2019 - Business Operations / Brian Weiss: Review and categorize information requests provided by M. Avenatti. | 0.40 | \$495.00 | \$198.00 |
| Service | 02/25/2019 - Business Operations / Brian Weiss: Prepare spreadsheet with recent closed and open cases based on information from J. Frank and M. Avenatti. Send to J. Frank, J. Reitman and M. Avenatti, | 2.20 | \$495.00 | \$1,089.00 |
| Service | 02/26/2019 - Accounting & Bookkeeping / Ellen Sprague: Forward insurance payment to client | 0.10 | \$255.00 | \$25.50 |
| Service | 02/26/2019 - Business Operations / Brian Weiss: Telco with M. Avenatti re: case list and document requests. | 0.80 | \$495.00 | \$396.00 |
| Service | 02/26/2019 - Litigation Support / Brian Weiss: Telco with Valid8 software for introduction to bank information loaded into the software. | 1.50 | \$495.00 | \$742.50 |
| Service | 02/26/2019 - Litigation Support / Brian Weiss: Prepare case list master file. | 0.90 | \$495.00 | \$445.50 |
| Service | 02/26/2019 - Litigation Support / Brian Weiss: Telco with J. Reitman re: case issues. | 0.30 | \$495.00 | \$148.50 |

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|---------|---|------|----------|-------------------|
| Service | 02/27/2019 - Information Technology Consulting / Erik Nathan: Internal discussion. Hardware prep for an on-site visit. | 0.40 | \$375.00 | \$150.00 |
| Service | 02/27/2019 - Business Operations / Brian Weiss: Contact insurance broker re: receivership order, adding receiver as named insured and status of insurance policies. | 0.40 | \$495.00 | \$198.00 |
| Service | 02/27/2019 - Business Operations / Brian Weiss: Sign bank signature cards for receivership accounts. | 0.10 | \$495.00 | \$49.50 |
| Service | 02/27/2019 - Business Operations / Brian Weiss: Update information request control log and process mail. | 0.40 | \$495.00 | \$198.00 |
| Service | 02/27/2019 - Business Operations / Brian Weiss: Telco with Najah at the IRS re: Receivership order. Read stipulation between EA and the IRS. | 0.60 | \$495.00 | \$297.00 |
| Service | 02/28/2019 - Information Technology Consulting / Erik Nathan: Prep hardware and software for on-site use. Internal discussions. | 3.60 | \$375.00 | \$1,350.00 |
| Service | 02/28/2019 - Business Operations / Brian Weiss: Read bankruptcy schedules and statement of financial affairs, including amendments. | 1.30 | \$495.00 | \$643.50 |
| Service | 02/28/2019 - Business Operations / Brian Weiss: Telco with J. Frank re: upcoming judgment debtor exam. Telco re: art held, insurance policies and open cases. | 0.40 | \$495.00 | \$198.00 |
| Expense | Federal Receivership: Postage (02/01/2019 - 02/28/2019) | 1.00 | \$2.10 | \$2.10 |

Amount Due \$19,274.10

Notes

Please contact Force 10 for electronic payment information.
EIN# 81-2745810

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EXHIBIT D

LANDAU GOTTFRIED & BERGER LLP

ATTORNEYS AT LAW
 1801 Century Park East, Suite 700
 Los Angeles, CA 90067
 Telephone (310) 557-0050
 Facsimile (310) 557-0056
 www.LGBFIRM.com

Mr. Brian Weiss, Receiver of
 Eagan Avenatti, LLP Receivership Estate
 c/o Force 10 Partners
 20341 SW Birch, Suite 220
 Newport Beach, CA 92660

3/8/2019

Invoice # 14733

Client: 1274 Brian Weiss,
 Receiver-Avenatti
 Matter: 0001 General Representation
 For Services Rendered Through 2/28/2019

Fees

| | | Hours | Rate | Amount |
|------------------------|--|-------|-----------|------------|
| <u>Jack A. Reitman</u> | | | | |
| 02/19/2019 | Legal research re: LLP privilege. | 2.50 | 425.00/hr | \$1,062.50 |
| 02/20/2019 | Legal research re: LLP privilege. | 3.50 | 425.00/hr | \$1,487.50 |
| 02/28/2019 | Legal research re: status of creditors in receivership. | 3.00 | 425.00/hr | \$1,275.00 |
| | Timekeeper Total | 9.00 | | \$3,825.00 |
| <u>John P. Reitman</u> | | | | |
| 02/14/2019 | Read emails from B. Weiss re preparation of documents (.2); read Order of appointment as Receiver (.7); prepare materials for conflicts check (1.0 n/c); draft engagement agreement (2.3 n/c); draft form of receiver appointment letter to banks (.6); draft form of receiver appointment letter to clients and contingent fee obligors (.3); review California receiver statutes and rules of court and federal law re receiver's oath and draft same for filing (.1); telephone conferences with B. Weiss re preparation of documents and his question re fraudulent transfer law (.3). | 2.20 | 565.00/hr | \$1,243.00 |
| 02/15/2019 | Telephone conferences (4) with B. Weiss re fraudulent transfer law questions and administrative issues. | 0.40 | 565.00/hr | \$226.00 |

Fees

| | | Hours | Rate | Amount |
|------------------------------------|--|--------------|-----------|-------------------|
| 02/21/2019 | Telephone conference with Receiver re proposed conference call with J. Frank re status, J. Frank's activities and investigations to date, Receiver's communications with M. Avenatti re requests for information, Receiver's communications third-parties re potential receivership assets, computer investigative systems, and work to be done (.3); read communications from Receiver to M. Avenatti re information to be provided (.3). | 0.60 | 565.00/hr | \$339.00 |
| 02/25/2019 | Read District Court order re denial of motion to decertify Kimberly-Clark class based on Egan Avenatti bankruptcy (.3) and telephone conference with Receiver re same (.3). | 0.60 | 565.00/hr | \$339.00 |
| 02/25/2019 | Conference call with Reciever and J. Frank re background facts, documents requested, investigations and pending work (1.5); re-read Receivership and Restraining Order and draft email to Receiver and J. Frank re scope of same (.4). | 1.90 | 565.00/hr | \$1,073.50 |
| 02/25/2019 | Review subpoenas (and specific requests) for documents served by J. Frank on Boston Private Bank & Trust, Barclays Bank Delaware and JP Morgan Chase. | 0.40 | 565.00/hr | \$226.00 |
| 02/26/2019 | Telephone conference with S. Bledshoe and his partner, counsel to EA client G. Barela re misuse of client funds and claim (.5); follow up telephone conference with Receiver re same, EA bank records (Barela trust account) and insurance, debtor examination and transfer of records to me (.3). | 0.80 | 565.00/hr | \$452.00 |
| 02/27/2019 | Prepare contingency fee representation agreement for receivership estate litigation matters. | 5.00 | 565.00/hr | No Charge |
| Timekeeper Total | | 11.90 | | \$3,898.50 |
| Total Professional Services | | 20.90 | | \$7,723.50 |

Timekeeper Summary

| Attorney | Hours | Rate | Value |
|---------------------|--------------|--------|-------------------|
| JAR Jack A. Reitman | 9.00 | 425.00 | \$3,825.00 |
| JPR John P. Reitman | 5.00 | 0.00 | No Charge |
| JPR John P. Reitman | 6.90 | 565.00 | \$3,898.50 |
| Total | 20.90 | | \$7,723.50 |

Billing Summary

| | |
|--------------------------|-------------------|
| Current Fees: | \$7,723.50 |
| TOTAL AMOUNT DUE: | \$7,723.50 |

Thank You for Letting Us Serve You.

Payment Due Upon Receipt.

Please Include Your Invoice Number on Your Payment.

If you have questions regarding your invoice, please call Sheila Hazard at (310) 557-0050 Ext: 121.